

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
MICHAEL KRUISE WILLIAMS,	:	
	:	22 Cr.
Defendant.	:	
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WHEREAS, on or about July 29, 2022, the Government filed a two-count felony Information (the "Information") against MICHAEL K. WILLIAMS (the "defendant"), charging production and distribution of false identity documents and authentication features in violation of Title 18, United States Code, Sections 1028 and 2 (Count One); and bank fraud in violation of Title 18, United States Code, Section 1344 (Count Two);

WHEREAS, on or about February 24, 2021, the Government seized certain items listed in Appendix A hereto (the "Specific Property") from the Defendant's residence in Mamaroneck, New York (the "Mamaroneck Address") and place of business in Norwalk, Connecticut (the "Norwalk Address");

WHEREAS, on or about July 29, 2022, the defendant pled guilty to Counts One and Two of the Information, pursuant to a plea agreement with the Government, wherein the defendant admitted the forfeiture allegations with respect to Counts One and Two of the Information and agreed to forfeit to the United States, (i) pursuant to Title 18, United States Code, Section 981(a)(1)(C) and

Title 28, United States Code, Section 2461(c), a sum of money equal to \$297,313.52 in United States currency, representing proceeds traceable to the commission of the offenses charged in Counts One and Two of the Information, and (ii) pursuant to Title 18, United States Code, Section 1028(b)(5) and Title 28, United States Code, Section 2461(c), all right, title and interest of the defendant in the Specific Property listed in Appendix A hereto;

WHEREAS, the defendant consents to the entry of a money judgment in the amount of \$297,313.52 in United States currency representing the amount of proceeds traceable to the offenses charged in Counts One and Two of the Information that the defendant personally obtained;

WHEREAS, the Defendant further consents to the forfeiture of all his right, title and interest in the Specific Property, which constitutes property involved in the offense charged in Count One of the Information; and

WHEREAS, the defendant admits that, as a result of acts and/or omissions of the defendant, the proceeds traceable to the offenses charged in Counts One and Two of the Information that the defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney, T. Josiah

Pertz, of counsel, and the defendant, and his counsel, Michael Braverman, Esq., that:

1. As a result of the offense charged in Counts One and Two of the Information, to which the defendant pled guilty, a money judgment in the amount of \$297,313.52 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offenses charged in Counts One and Two of the Information that the defendant personally obtained, shall be entered against the defendant.

2. As a result of the offense charged in Count One of the Information, to which the Defendant pled guilty, all of the Defendant's right, title and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the defendant, MICHAEL K. WILLIAMS, and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Department of

Treasury, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

4. The United States Department of Treasury or its designee shall be authorized to deposit the payment on the Money Judgment in the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture/Money Judgment to Assistant United States Attorney Alexander J. Wilson, Co-Chief of the Money Laundering and Transnational Criminal Enterprises Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

9. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

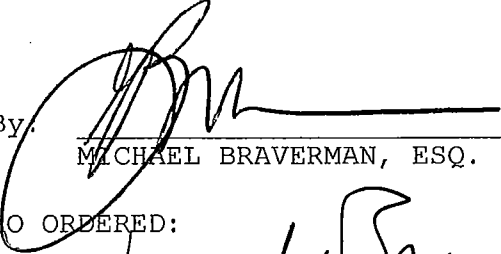
By: /s/ T. Josiah Pertz
T. JOSIAH PERTZ
Assistant United States Attorney
300 Quarropas Street
White Plains, New York 10601

7/8/2022
DATE

MICHAEL KRUISE WILLIAMS,
DEFENDANT

By: 
MICHAEL KRUISE WILLIAMS

7/29/22
DATE

By: 
MICHAEL BRAVERMAN, ESQ.

7/29/22
DATE

SO ORDERED:



11/22/22
DATE

HONORABLE VINCENT BRICCETTI
UNITED STATES DISTRICT JUDGE

Appendix A

Seized From the Mamaroneck Address on or about February 24, 2021

iMac A2115
Black Tower Computer Serial #: 5872CC49D13701DB15
Mac Laptop
Lenovo Laptop
Black iPhone (1 of 2)
Black iPhone (2 of 2)
Flash Drives
Toshiba Hard Drive
Silver WD Hard Drive
Black Hard Drive
Black Easy Store Hard Drive
2.5" SATA Hard Drive
Credit Cards
Documents Bearing Other Names
IDs Bearing Other Names

Seized from the Norwalk Address on or about February 24, 2021

Black Computer Tower
HP Pavilion Tower
ID Card Printer
State Holograms
Blank ID Cards
Laminates
Credit Cards Bearing Other Names
Fake Social Security Cards
Fake ID Cards
OSHA Logos
Fake OSHA Cards
Passport in Other Name
Group Order List
Instructions for Document Verification
Documents Bearing Other Names
ID Cards Bearing Other Names
Social Security Card